

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Civil Action No. 2:22-cv-547 (MJH)

Plaintiff,

The Honorable Marilyn J. Horan

vs.

**MICHAEL RUSSIN, RUSSIN
FINANCIAL, RUSSIN GROUP, SIMON
ARIAS, III, ARIAS AGENCIES, S.A.
ARIAS HOLDINGS, LLC, AMERICAN
INCOME LIFE INSURANCE COMPANY,**

ELECTRONICALLY FILED

Defendants.

**DEFENDANT AMERICAN INCOME LIFE INSURANCE COMPANY’S UNOPPOSED
MOTION FOR EXTENSION OF TIME TO FILE A REPLY MEMORANDUM OF LAW
IN FURTHER SUPPORT OF ITS MOTION TO COMPEL
ARBITRATION AND STAY THE CASE**

Pursuant to the Standing Order and Procedures on Civil Practice, ECF No. 3, Defendant American Income Life Insurance Company (“Defendant AIL”), respectfully moves this Court for an extension of time to file a Reply Memorandum of Law in further support of its Motion to Compel Arbitration and Stay the Case. In support of this Motion, Defendant AIL states as follows:

1. On June 13, 2022, Defendant AIL filed a Motion to Compel Arbitration and Stay the Case and a Brief in Support of its Motion. ECF Nos. 17, 18.
2. On the same date, Defendants Simon Arias, III, Arias Agencies, S.A. and Arias Holdings, LLC joined in Defendant AIL’s Motion. ECF Nos. 20-21.
3. Defendants Michael Russin, Russin Financial and Russin Group also have joined in the Motion. ECF Nos. 22-23.
4. On June 29, 2022, Plaintiff filed a Response to Defendant AIL’s Motion to Compel Arbitration and Stay the Case and Remaining Defendants’ Joinders To Same. ECF No. 24. On

June 30, 2022, Plaintiff filed a Brief In Support of Plaintiff's Response to Defendant, American Income Life Insurance Company's Motion To Compel Arbitration And Stay Case And Joinders To Same. ECF No. 25.

5. Under the Standing Order and Procedures on Civil Practice, ECF No. 3, AIL has 7 days to submit its Reply Brief.

6. Given the impending July 4th holiday weekend, Defendant AIL respectfully requests that it be given until July 14, 2022 to file its Reply Brief.

7. Defendant AIL has discussed the Motion with all other parties and all other parties consent to Defendant AIL's motion.

WHEREFORE, Defendant American Income Life Insurance Company respectfully requests that this Honorable Court enter the Order attached hereto.

Respectfully submitted,

POST & SCHELL, P.C.

Dated: July 1, 2022

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*Attorneys for American Income Life Insurance
Company*

CERTIFICATE OF SERVICE

I, Andrea Kirshenbaum, hereby certify that the foregoing Unopposed Motion of Defendant American Income Life Insurance Company For Extension Of Time To File A Reply Memorandum Of Law In Further Support Of Its Motion To Compel Arbitration And Stay The Case was electronically filed with the Court and is available for viewing and downloading from the CM/ECF System and thereby has been served upon the following counsel of record, electronically:

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Dated: July 1, 2022

s/Andrea M. Kirshenbaum
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